

Justification for Nonmaterial/Nonsubstantive Change

The OCC recently received a 3-year extension of approval under the PRA for its Bank Secrecy Act/Anti-Money Laundering Risk Assessment Form (Form). The 60-Day and 30-Day *Federal Register* notices issued and all of the information entered into ROCIS during the approval of the extension reflected the content of the updated version of the Form (2009) (described in the next paragraph) with the exception of the instrument itself. The last approved version of the Form (2007) was mistakenly included in the ROCIS submission in place of the 2009 version.

The 2009 Form includes certain changes from the 2007 version. These include: (i) the removal of the Special Use Accounts line item and a corresponding enhancement of the assessment process by including products, services, and customers (PSC) related to the emerging risk areas of Remotely Created Checks, Remote Deposit Capture, Bulk Cash/Currency Repatriation, and Third Party Senders; and (ii) the division of the previous Stored Value line item into two new data collection categories (Reloadable and Non-Reloadable). All of the changes were made within the existing subject headers.

The OCC requests approval of the 2009 form as a nonmaterial/nonsubstantive change.